

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

JONATHAN S. ABADY
MATTHEW D. BRINCKERHOFF
ANDREW G. CELLI, JR.
RICHARD D. EMERY
DEBRA L. GREENBERGER
DIANE L. HOUK
DANIEL J. KORNSTEIN
JULIA P. KUAN
HAL R. LIEBERMAN
ILANN M. MAAZEL
KATHERINE ROSENFELD
ZOE SALZMAN
SAM SHAPIRO
EARL S. WARD
O. ANDREW F. WILSON

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10TH FLOOR
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbawm.com

VASUDHA TALLA
ERIC ABRAMS
DAVID BERMAN
NICK BOURLAND
DANIEL M. EISENBERG
SARA LUZ ESTELA
ANDREW K. JONDAHL
SARAH MAC DOUGALL
SANA MAYAT
HARVEY PRAGER
VIVAKE PRASAD
MAX SELVER
EMILY K. WANGER

September 22, 2023

Via ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Goidel et al. v. Aetna Life Insurance Co., No. 21-cv-7619

Your Honor:

We write today to provide an update on the status of settlement discussions. Dkt. 74. The Parties are pleased to inform the Court that a settlement term sheet has been signed. The Parties therefore request an additional 60-day stay to prepare the settlement agreement and motion for preliminary approval. To the extent that the Parties are unable to agree on a final settlement agreement, the Parties further agree that Plaintiffs shall not be prejudiced by this stay, including that Defendant shall not raise any arguments in opposition to class certification that would not have been available to them on June 30, 2023.

The parties respectfully ask the Court to so order this request.

Sincerely,

/s/

EMERY CELLI BRINCKERHOFF
ABADY WARD & MAAZEL LLP
Zoe Salzman
Debra Greenberger
Eric Abrams
600 Fifth Avenue, 10th Floor
New York, New York 10020

/s/

BAKER BOTTS LLP
Earl B. Austin
Sarah Reeves
30 Rockefeller Plaza
New York, New York 10112
(212) 408-2500

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

Page 2

(212) 763-5000

NATIONAL WOMEN'S LAW
CENTER

Michelle Banker

Alison Tanner*

Noel R. León

Sudria H. Twyman*

1350 I Street NW, Suite 700

Washington DC 20005

(202) 588-5180

CALCAGNI & KANEFSKY LLP

Mariellen Dugan

One Newark Center

1085 Raymond Blvd, 14th Floor

Newark, New Jersey 07102

Attorneys for Defendant

Attorneys for Plaintiffs

*Admitted *pro hac vice*

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 09/25/2023

This action is hereby STAYED until November 22, 2023.

The parties shall provide an update on the status of
settlement discussions by November 22, 2023.